

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF

**RAHUL MANCHANDA**

FILED  
U.S. BANKRUPTCY COURT


2017 DEC 28 P 2: 41

**INDEX NO. 11-14666-SMB**

**NOTICE OF MOTION  
TO REMOVE BANKRUPTCY RECORD  
DUE TO ERRONEOUS FILING**

**PLEASE TAKE NOTICE** that upon the annexed affirmation of Rahul Manchanda duly affirmed the 28<sup>th</sup> day of December 2012, the annexed Memorandum of Law, and all the Pleadings and Proceedings heretofore had herein, the Undersigned will move this Honorable Court at a mutually agreeable time and place or as soon as thereafter as Counsel can be heard for an order completely removing and erasing the bankruptcy records from credit history and beyond for case index no. 11-14666-SMB because it was filed in error by former In-House Counsel for Rahul Manchanda.

**Dated:** December 28, 2012  
New York, NY

  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF

**RAHUL MANCHANDA**

**INDEX NO. 11-14666-SMB**

**AFFIRMATION IN SUPPORT OF  
MOTION REMOVE BANKRUPTCY  
RECORD DUE TO ERRONEOUS  
FILING**

STATE OF NEW YORK        }  
COUNTY OF NEW YORK       } ss

**RAHUL MANCHANDA**, an Attorney duly licensed to practice law in the State of New York, affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion To Remove Bankruptcy Record for Case Index No. 11-14666-SMB in all respects based upon my personal knowledge of the facts and experiences I relate herein and based upon information and belief.
2. The only reason Case Index No. 11-14666-SMB was ever filed in the first place, is because former counsel Jeffrey Estrella for Rahul Manchanda erroneously prepared and filed for bankruptcy in his personal name, not for his company Manchanda Law Offices PLLC (which was later filed and closed in case no. 11-15837-SMB).
3. This erroneous and incorrect filing has caused untold stress and problems for Rahul Manchanda as the case was not correctly filed and did not yield any true benefit for Rahul Manchanda as it was not prepared or advanced properly by said former in-house counsel and was ultimately dismissed, and also the vast majority of debts were under the previously named company, not Rahul Manchanda.

**WHEREFORE**, it is respectfully requested that this Motion be granted in all respects together with such other and further relief as this Honorable Court deems to be just and proper, including erasing and removing any and all records relating to erroneously filed bankruptcy case no. 11-14666-SMB from all credit records and comparable databases herein tending to affect Rahul Manchanda's credit history, and in light of the information contained herein.

Dated: December 28, 2012  
New York, NY

Rahul Manchanda